



February 22, 2019

Legislative Policy Committee
Co-Chair: The Honorable Thomas V. Mike Miller, Jr.,
Senate President
Co-Chair: The Honorable Michael E. Busch, House Speaker
Department of Legislative Services
C/O Ms. Sarah Albert
Legislative Services Building, Room 200B
90 State Circle
Annapolis, MD 21401

University Police

Towson University
8000 York Road

Towson, MD 21252-0001

t. 410 704-2505
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Dear Ms. Albert:

Pursuant to Public Safety Article 3-509 and Maryland State Government Section 2-1246, please find the attached results of the 2018 License Plate Reader audit for the Towson University Police Department.

The audit was performed in a manner consistent with departmental policy and state law. The audit revealed that the Towson University Police Department's LPR program is in compliance with all mandated requirements.

Please feel free to contact me should you have any questions or additional needs.

Sincerely,

Charles J. Herring deb

Charles J. Herring, Chief of Police
Director, Office of Public Safety

Attachment

CJH/deb



TOWSON UNIVERSITY POLICE DEPARTMENT



Date: February 13, 2019

To: House Judiciary Committee, Senate Judicial Proceedings Committee, & Legislative
Policy Committee

From: Towson University Police Department

Subject: License Plate Reader (LPR) Program required information per Public Safety Article 3-509

Maryland House Judiciary Committee:

Chair – The Honorable Luke H. Clippinger
House Office Building, Room 101
6 Bladen St., Annapolis, MD 21401

Maryland Senate Judicial Proceedings Committee:

Chair – The Honorable Robert A. Zirkin
Miller Senate Office Building, 2 East Wing
11 Bladen St., Annapolis, MD 21401 - 1991

Maryland Legislative Policy Committee:

Co-Chair – The Honorable Thomas V. Mike Miller Jr.
Co-Chair – The Honorable Michael E. Busch
C/o Department of Legislative Services
Legislative Services Building, Room 200B, 90 State Circle, Annapolis, MD 21401

Honorable Chairmen,

In accordance with 2-1246 of the State Government Article, the Towson University Police Department is reporting the following information regarding captured License Plate Reader (LPR) data for **2018**:

1. The total number of automatic license plate reader units being operated in the state by law enforcement agencies and the number of units submitting data to the Maryland Coordination and Analysis Center:

The Towson University Police Department has a total of:

**6 fixed LPR sites (10 individual cameras) and
1 mobile units (2 individual cameras operated in pair).**

All units operated by the Towson University Police department submit data to the Maryland Coordination and Analysis Center.

2. The number of automatic license plate reader readings made by a law enforcement agency that maintains an automatic license plate reader database and the number of readings submitted to the Maryland Coordination and Analysis Center.

In 2018, the Towson University Police Department conducted 3,676,764 fixed site readings and 87,673 mobile readings. Barring any technological issues, every reading was submitted to the Maryland Coordination and Analysis Center.

3. The number of automatic license plate reader readings being retained on the automatic license plate reader database.

No license plate readings from the calendar year 2018 are being retained in the local Towson University Police license plate reader database. Readings are only retained for a period of 24 hours before being purged.

The Towson University Police Department submits all plate reader readings to the Maryland Coordination and Analysis Center and only maintains the past twenty four (24) hours of readings on its local automatic license plate reader database. The number of readings in the database varies from day-to-day due to fluctuating traffic patterns. The below twenty four (24) hour period is offered as a reference for the capacity of the Towson University automatic license plate reader database.

As of February 13, 2019 at 01:34 a.m., the total number of automatic license plate reader readings being retained on the Towson University Police automatic license plate reader database was 11,771. These readings were captured during the time of February 12th through February 13th 2019.

4. The number of requests made to the law enforcement agency that maintains an automatic license plate reader database for automatic license plate reader data, including specific numbers for:

Note: The Towson University Police does not accept requests from outside law enforcement agencies for automatic plate reader data.

- a. The number of requests that resulted in a release of information.

Zero. (There were no requests from another agency to access the Towson University Police database.)

- b. The number of out of state requests.

Zero. (There were no out of state requests to access the Towson University Police database.)

- c. The number of federal requests.

Zero. (There were no requests from federal agencies to access the Towson University Police database.)

- d. The number of out of state requests that resulted in a release of information.

Zero. (There were no requests from another agency to access the Towson University Police database.)

- e. The number of federal requests that resulted in a release of information.

Zero. (There were no requests from federal agencies to access the Towson University Police database.)

5. Any data breaches or unauthorized uses of the automatic license plate reader database.

There were no data breaches or unauthorized use of the automatic license plate reader database.

6. A list of audits that were completed by the law enforcement agency.

The Towson University Police Department conducted an audit on the automatic license plate reader database for calendar years 2015, 2016, 2017, and 2018 queries.

Members of the Towson University Police Department, for investigative or administrative tasks, queried the Towson University Police database 52 times in calendar year 2018. 52 queries were selected for audit as a specified minimum. The audit findings are attached to this letter.

The Department of State Police and any law enforcement agency using an automatic license plate reader system shall adopt procedures relating to the operation and use of the system. The procedures shall include:

- I. Which personnel in the law enforcement agency are authorized to query captured plate data gathered by an automatic license plate reader system.

Towson University Police General Directive 2.442.04 states:

“Investigations Unit Officers and Officers assigned to supervise the Communications Unit are the Only Employees who are allowed to:

- 1. Run Investigative Queries on Locally Collected, Active LPR Data;**
- And**
- 2. Manage (e.g. Upload, Modify, or remove) local listings.”**

Currently there are 4 users authorized to query the database.

- II. An audit process to ensure that information obtained through the use of an automatic license plate reader system is used only for legitimate law enforcement purposes, including audits of requests made by individual law enforcement agencies or an individual law enforcement officer.

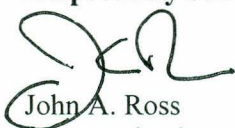
The Towson University Police Department’s Communications Unit is charged with conducting and/or reviewing audits to ensure compliance with rules and regulations pertaining to the legitimate use of LPR data. The Towson University Police Department received the model policy from the Maryland Coordination and Analysis Center.

- III. Procedures and safeguards to ensure that department staff with access to the automatic license plate reader database are adequately screened and trained.

Users of the Towson University Police LPR system is restricted to certain personnel and users are required to log onto the LPR software via issued departmental credentials. Activity within the system is logged. Access and scope of access is regulated by the department’s LPR Administrator and is based on job position, job duties or assignment. Only properly trained individuals are permitted to conduct queries on the Towson University Police license plate reader database.

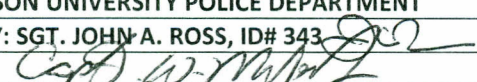
All users (with database query abilities) have attended a training class. All users have had undergone background screening by virtue of their employment with the police department.

Respectfully Submitted,



John A. Ross
Communications Supervisor/Sergeant
Towson University Police

Audit Questions (Step 1)

Goal	Question	Answer	Comments
1	Have procedures been adopted relating to the operation and use of the LPR system? [Cite policy number]	YES	2.442 License Plate Recognition Program Comm. 09.02 License Plate Recognition System PS 02.14 Local LPR Listings
2	Are staff with access to the Automatic License Plate Reader database adequately screened and trained in the proper use of the system and all privacy policies relating thereto?	YES	All agency personnel who have access have undergone background checks and advised of privacy and confidentiality requirements.
3	Does the agency maintain training records for each user?	YES	Yes, via PowerDMS.
4	Is the training curricula maintained?	YES	Office of Professional Standards
5	Are training records annually reviewed for relevancy and effectiveness?	YES	Office of Professional Standards
6	Does the agency accept law enforcement requests for license plate data collected by an LPR system?	NO	The agency does not accept requests from outside LE agencies. Outside LE agencies are referred to MCAC for data.
7	If historical data is accessed, does the agency have an audit trail?	YES	Data kept only for 24 hour period before being sent to MCAC and cleared. Any queries during that time require purpose information through the Enterprise Operation Center.
8	Is the audit trail maintained for at least 3 years?	YES	2015, 2016, 2017, current 2018
9	Have audit procedures been adopted to ensure that information obtained through the use of an LPR system is used only for legitimate law enforcement purposes?	YES	Enterprise Operation Center requires purpose information for each query. The Towson University Police Communications Unit is tasked with ensuring the proper use of the LPR system
AGENCY: TOWSON UNIVERSITY POLICE DEPARTMENT		SCOPE OF AUDIT: 01/01/2018 – 12/31/2018 Review of Logs	
COMPLETED BY: SGT. JOHN A. ROSS, ID# 343		DATE COMPLETED: 02/13/2019	
REVIEWED BY: 		DATE REVIEWED: 2/13/19	

Audit Questions Step 2	Question # 1	Question #2	Question # 3	Question # 4	Question #5	Results
Record #	Purpose of Query OR Incident Number of Query	Is the date and time of request documented?	Is the purpose of the request documented?	Does the request include the identity of the agency requesting the query?	Has the request been validated through the requesters agency?	Findings shall be listed as: Accurate, Inaccurate, Unable to locate or Incomplete
RECORD SET 1						
1	INVESTIGATION/18-00617	Y	Y	Y	Y	ACCURATE
2	INVESTIGATION/18-00337	Y	Y	Y	Y	ACCURATE
3	INVESTIGATION-18-04-06-013732	Y	Y	Y	Y	ACCURATE
4	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
5	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
6	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
7	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
8	INVESTIGATION-18-00147	Y	Y	Y	Y	ACCURATE
9	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
10	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
11	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
12	INVESTIGATION/18-01-29-004000	Y	Y	Y	Y	ACCURATE
RECORD SET 2						
1	INVESTIGATION/18-00738	Y	Y	Y	Y	ACCURATE
2	INVESTIGATION/18-00738	Y	Y	Y	Y	ACCURATE
3	INVESTIGATION/18-08-02-028107	Y	Y	Y	Y	ACCURATE
4	TECH SUPPORT	Y	Y	Y	Y	ACCURATE
5	TECH SUPPORT	Y	Y	Y	Y	ACCURATE
6	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
7	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
8	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
9	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
10	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
11	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
12	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE

13	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
14	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
15	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
16	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
17	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
18	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
19	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
20	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
21	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
22	INVESTIGATION/18-04-06-013732	Y	Y	Y	Y	ACCURATE
23	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
24	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
25	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
26	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
27	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
28	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
29	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
30	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
31	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
32	INVESTIGATION/18-00080	Y	Y	Y	Y	ACCURATE
RECORD SET 3						
1	INSPECTION/18-00692	Y	Y	Y	Y	ACCURATE
2	ADMINISTRATIVE PLATE REMOVAL/18-00692	Y	Y	Y	Y	ACCURATE
3	SUPV REVIEW INVESTIGATION/18-00692	Y	Y	Y	Y	ACCURATE
4	PLATE ENTRY VERIFICATION/18-00692	Y	Y	Y	Y	ACCURATE
5	INVESTIGATION/18-00692	Y	Y	Y	Y	ACCURATE
6	INVESTIGATION/18-00692	Y	Y	Y	Y	ACCURATE
7	TECH SUPPORT	Y	Y	Y	Y	ACCURATE
8	TECH SUPPORT	Y	Y	Y	Y	ACCURATE

Certifying
Official:

Sgt. John A. Ross,
ID#343

Signature:



Date: 02/13/2019